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ExxonMobil
Chemical

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Via Electronic Submission

March 9, 2004

Hon. Michael O. Leavitt
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program
ExxonMobil Chemical Company Registration Number

Dear Mr. Leavitt:

ExxonMobil Chemical Company (EMCC) previously submitted for review and public comment a test plan (dated February 5, 2002) and related robust summaries for the *Alkyl Alcohols C6-C13 Category*, under the US High Production Volume (HPV) Chemical Challenge Program, AR-201. This test plan and associated robust summaries are currently posted on the Environmental Protection Agency (EPA) website at: www.epa.gov/chemrtk/alkal613/c13590tc.htm. EMCC has revised that test plan and resubmits the attached test plan dated February 28, 2003. Please accept this test plan as a replacement to the test plan dated February 5, 2002.

The revised Alkyl Alcohols C6-C13 Category test plan (28Feb03) contains an additional substance, Chemical Abstract Service (CAS) registry number (#), 28473-21-4 (nonanol), that was not covered in the test plan dated February 5, 2002. The CAS #s for this category now include:

CAS# 68526-79-4: Hexanol, branched and linear
CAS# 70914-20-4: Alcohols C6-8, branched
CAS# 68526-83-0: Alcohols C7-9 iso, C8 rich
CAS# 68526-84-1: Alcohols C8-10 iso, C9 rich
CAS# 28473-21-4: Nonanol
CAS# 68526-85-2: Alcohols C9-11 iso, C10 rich
CAS# 68526-86-3: Alcohols C11-14 iso, C13 rich

The addition of nonanol, semi-linear (CAS# 28473-21-4), to the Alkyl Alcohols C6-C13 Category is consistent with the description of this category:

- Primary alcohols with a common structure represented by RCOH
- An incremental and constant change across the category where R is an alkyl group having carbon numbers C5, C6, C7, C8, C9, C11, or C13 as the main constituent.

- A likelihood of common precursors and breakdown products that can result in structurally similar metabolites (e.g. carboxylic acid).

This revised test plan is based on the observation that the toxicological properties are similar or vary in an incremental and predictable fashion within the category.

Please forward technical comments on this test plan to Dr. Laura H. Keller at the above address or you may contact her at (281) 870-6501 (email: laura.h.keller@exxonmobil.com).

Sincerely,

Nigel J. Sarginson
Product Stewardship & Regulatory Affairs Manager
ExxonMobil Chemical Company

cc: Laura H. Keller

Enclosure 1 (electronic): Test Plan - Alkyl Alcohols C6-C13 Category Revised 28Feb03.pdf